

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Andrea Zimmerman,

Civil No. 20-CV-1336 (ECT/HB)

Plaintiff,

**PLAINTIFF'S CERTIFICATE OF
COMPLIANCE**

v.

Standard Insurance Company,

Defendant.

Pursuant to Local Rule 7.1(f), the undersigned hereby certifies, as counsel for Plaintiff Andrea Zimmerman, that Plaintiff's Memorandum of Law in Support of Her Motion to Amend the Complaint to Add a Count for Bad Faith Under Minn. Stat. § 604.18 complies with the type-volume limitation as there are 2177 words of proportional space type in this Brief, exclusive of the caption and signature block. This Brief was prepared using Microsoft Word 10. I have relied upon the word count of this word processing program and certify that it has been applied specifically to include all text, including headings, footnotes, and quotations. The undersigned also certifies that pursuant to Local Rule 7.1(h) the Brief complies with the type-size limit.

Dated: February 25, 2021

**NOLAN, THOMPSON, LEIGHTON
& TATARYN, PLC**

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